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United States Bankruptcy Court Eastern District of Pennsylvania

In re:		Case No. 21-11342-AMC
	Steven C. Bonatsos,	Chapter 13
	Debtor.	

Debtors' Motion to Modify Chapter 13 Plan

AND NOW, Debtor Steven C. Bonatsos, by and through his attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

- 1. The Debtor filed this case under chapter 13 on May 11, 2021.
- 2. The trustee in this case is Kenneth E. West.
- 3. The plan was confirmed on December 22, 2021.
- 4. The Trustee recently filed a motion to dismiss this case for failure to make plan payments.
- 5. The Debtor wants to amend his plan to resolve the dismissal motion.
- 6. The proposed plan cures the arrearage that gave rise to the dismissal motion by increasing the Debtor's monthly plan payments moving forward.
- 7. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 85 as the new confirmed plan.
- 8. The Debtor has filed a supplemental Schedule J as evidence of the Debtor's ability to fund the new plan.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in his favor as may be necessary and proper under the law.

Date: February 10, 2025 CIBIK LAW, P.C. Counsel for Debtor

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